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RUBY KUMAR-THOMPSON, Partner
rkumarthompson@cgajlaw.com

Reply to: Oakland Office

March 7, 2019

VIA ELECTRONIC FILING

Honorable Esther Salas, U.S.D.J.
United States District Court, District of New Jersey
MLK Jr. Federal Bldg. & U.S. Courthouse
50 Walnut Street, Room 5076
Newark, New Jersey 07102

Re: Jacqueline Rosa/DOT v. Borough of Leonia, et al.
Civil Action No. 2:18-cv-15534-ES-MAH

Dear Judge Salas:

Please be advised that Defendants Borough of Leonia, Borough of Leonia Council, Judah Zeigler, and Tom Rowe are respectfully declining to file an objection to the Report and Recommendation of Magistrate Judge Hammer dated February 21, 2019 in the above-captioned matter, as the underlying state law issues are presently on appeal with the Appellate Division of the State of New Jersey as the result of the Commissioner of the Department of Transportation rendering a Final Agency Decision regarding the validity of the very same newly adopted Ordinances that are the subject of the Amended Complaints filed by the Department of Transportation and Jacqueline Rosa in the matter at bar.

Thank you in advance for Your Honor's courtesies and kind consideration with this matter.

Respectfully submitted,

/s Ruby Kumar-Thompson
RUBY KUMAR-THOMPSON
On Behalf of the Firm

RKT:

cc: Jacqueline Rosa, Esq. (via ECF only)
Phillip J. Espinoza, Esq. (via ECF only)
Brian Chewcaskie, Esq.-Borough Attorney (via e-mail only)

Oakland Office: 169 Ramapo Valley Road, UL 105, Oakland, NJ 07436 Tel 973 845-6700 Fax 201 644-7601

Somerville Office: 50 Division Street, Suite 501, Somerville, NJ 08876 Tel 732 583-7474 Fax 201 644-7601

Matawan Office: 955 State Route 34, Suite 200, Matawan, NJ 07747 Tel 732 583-7474 Fax 732 290-0753